

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS (BOSTON)**

DENNIS DIMON

v.

MICHAEL B. LATTI,  
LATTI ASSOCIATES,  
LATTI & ANDERSON LLP,  
METROPOLITAN LIFE INSURANCE COMPANY,  
KEMPER INSURANCE COMPANY, and  
MORGAN STANLEY DW, INC.

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C.A. No. 05-11073

**MOTION FOR EXTENSION OF TIME**

Pursuant to Fed. R. Civ. P. 6(b)(1), Defendant, Kemper Insurance Company (“Kemper”), by and through its undersigned counsel, hereby moves this Honorable Court for an extension of time within which to respond to the Complaint in this matter, and in support thereof, avers as follows:

1. Plaintiff served the Complaint on Kemper on or about June 30, 2005.
2. Kemper’s counsel has spoken with the office of counsel for Plaintiff, and Plaintiff’s counsel has consented to Kemper’s request for an extension of time.
3. There have no prior requests for extensions of time in this case.

WHEREFORE, defendant, Kemper Insurance Company, respectfully requests that it be granted an extension of time until August 5, 2005 in which to answer, move, or otherwise plead in response to the Complaint in this matter.

Respectfully submitted,

s/Matthew C. Welnicki/

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(215) 988-2865  
Attorney for Defendant,  
Kemper Insurance Company

Dated: July 15, 2005

**Certificate of Compliance**

I hereby certify that counsel for Defendant Kemper Insurance Company, Timothy J. O'Driscoll, consulted by telephone with counsel for the Plaintiff and that counsel for the Plaintiff assented to this Motion.

s/Matthew C. Welnicki/

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**Certificate of Service**

I hereby certify that I caused a copy of the above document to be served on counsel of record via this Court's Electronic Filing System and by first-class mail this 15<sup>th</sup> day of July, 2005.

s/Matthew C. Welnicki/

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